

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

JUL 14 2022

BY DEPUTY _____

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

JUAN DANIEL ALCOCER-ALONSO (1)

RICHARD B. VILLASENOR (2)

ANFERNEE ALEXANDER MARBAN (3)

a.k.a. "Fernee"

CRISTIAN SANDOVAL (4)

a.k.a. "Cris"

JESUS RAYMUNDO GALLEGOS (5)

(6)

(10)

a.k.a.

JOHN JACOB COALSON (11)

a.k.a. "J Coal"

MOHAMMAD ABEDALHAQ (12)

a.k.a. "Mo"

TRENT JOSEPH WOODHOUSE (13)

DARRYL MARVIN DOMINGUEZ (14)

a.k.a. "D"

(15)

a.k.a.

ANTONIO GATEWOOD (17)

ANDRES MORENO, JR. (18)

BOBBY JOSEPH KISH (19)

ANDREW NELSON MARCH (20)

ZACHARY ADRIAN BEDFORD (21)

JORGE EDDI SOTO (22)

MICHAEL GARRETT PARKER (23)

JOSHUA VELASQUEZ (24)

(25)

ROBERTO JAVIER MIRANDA (26)

GAGE LEE BUTLER (27)

JOSEPH ROSS (28)

TIMOTHY GENE HUGHES, JR. (29)

CONNOR HARRISON SNODGRASS (30)

(31)

(32)

(33)

Indictment

Page 1

SEALED

Case No. 4:21-CR-00285

Judge Mazzant

STEPHEN GLENN YARBROUGH (34)	§
ROMEL ORTIZ (35)	§
BRYAN BERNAL RIVAS (36)	§
JAMES SAMUEL BERRY (37)	§
[REDACTED] (38)	§
[REDACTED] (39)	§
[REDACTED] (40)	§
[REDACTED] (41)	§
JOSEPH RAMIREZ SANTOS (42)	§
FAIZON TYREE BROWN (43)	§
ZACHARY DON MATHIS (44)	§
BLAKE RAINES (45)	§
WALTER HERRERA (46)	§
[REDACTED] (47)	§
[REDACTED] (48)	§
[REDACTED] (49)	§
TOMAS DEHOYOS (50)	§
[REDACTED] (51)	§
[REDACTED] (52)	§
[REDACTED] (53)	§
MORGAN PITTMAN (54)	§
[REDACTED] (55)	§
[REDACTED] (56)	§

FIFTH SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy
to Possess with the Intent to Distribute
Marijuana)

That from sometime in or about August 2021, and continuously thereafter up to
and including the date of this Fifth Superseding Indictment, in the Eastern District of
Texas and elsewhere, **JUAN DANIEL ALCOCER-ALONSO, RICHARD B.**
VILLASENOR, ANFERNEE ALEXANDER MARBAN, a.k.a. “Fernee”,
CRISTIAN SANDOVAL, a.k.a. “Cris”, **JESUS RAYMUNDO GALLEGOS**,

Indictment

[REDACTED] and **BOBBY JOSEPH KISH**, defendants, did knowingly and intentionally combine, conspire, and agree with each other and persons known and unknown to the United States Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount marijuana, in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 28, 2021, in Carrollton, Texas, a location within the Eastern District of Texas, **JUAN DANIEL ALCOCER-ALONSO**, defendant, did knowingly possess firearms, namely, a Capital Armament CO, LLC Multi Caliber Rifle, Model #BCA15, Colt 38 Super Caliber Pistol, Model #Government, Serial #ELCEN10786, Ruger 57 Caliber Pistol, Model # Ruger 57, Serial #641-27575, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of marijuana.

In violation of 18 U.S.C. § 924(c).

Count Three

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 23, 2021, in Dallas, Texas, a location within the Northern District of Texas, **JESUS RAYMUNDO GALLEGOS** and [REDACTED] [REDACTED] defendants, did knowingly possess firearms, namely, a Glock 40 Caliber Pistol, Model #27, Serial #BXR087US, a Girsan 45 Caliber Pistol, Model #MC1911, Serial #T6368-19AA00026, a Glock 40 Caliber Pistol, Model 22Gen4, Serial #WDM965, a Romarm-CUGIR 762 Caliber Pistol, Model # Draco, Serial #DR-2655-09, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of marijuana.

In violation of 18 U.S.C. § 924(c).

Count Four

Violation: 21 U.S.C. § 846
(Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance (Fentanyl) Resulting in Death)

That from sometime in or about August 2021, and continuously thereafter up to and including the date of this Fifth Superseding indictment, in the Eastern District of Texas and elsewhere, **ANFERNEE ALEXANDER MARBAN**, a.k.a. "Fernee", **CRISTIAN SANDOVAL**, a.k.a. "Cris", **JESUS RAYMUNDO GALLEGOS**,

[REDACTED] [REDACTED]
a.k.a. [REDACTED] **JOHN JACOB COALSON**, a.k.a. "J Coal", **MOHAMMAD**

ABEDALHAQ, a.k.a. "Mo", **TRENT JOSEPH WOODHOUSE**, **DARRYL**

MARVIN DOMINGUEZ, a.k.a. "D", [REDACTED] a.k.a. [REDACTED] ANTONIO GATEWOOD, ANDRES MORENO, JR., BOBBY JOSEPH KISH, ANDREW NELSON MARCH, ZACHARY ADRIAN BEDFORD, JORGE EDDI SOTO, MICHAEL GARRETT PARKER, JOSHUA VELASQUEZ, [REDACTED] [REDACTED] ROBERTO JAVIER MIRANDA, GAGE LEE BUTLER, JOSEPH ROSS, TIMOTHY GENE HUGHES, JR., CONNOR HARRISON SNODGRASS, [REDACTED] [REDACTED] [REDACTED] [REDACTED] STEPHEN GLENN YARBROUGH, ROMEL ORTIZ, BRYAN BERNAL RIVAS, JAMES SAMUEL BERRY, [REDACTED] [REDACTED] [REDACTED] JOSEPH RAMIREZ SANTOS, FAIZON TYREE BROWN, ZACHARY DON MATHIS, BLAKE RAINES, WALTER HERRERA, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] TOMAS DEHOYOS, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] MORGAN PITTMAN, [REDACTED] [REDACTED] and [REDACTED] defendants, did knowingly

and intentionally combine, conspire, and agree with each other and persons known and unknown to the United States Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (Fentanyl), and the death of A.S.W.J. on or about January 17, 2022, resulted from the use of Fentanyl distributed specifically by defendants in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Five

Violation: 18 U.S.C. § 1956(h)
1956(a)(2)(A) and (a)(2)(B)(i)
(Conspiracy to Commit Money
Laundering)

That from sometime in or about August 2021, and continuing thereafter up to and including the date of this Fifth Superseding Indictment, in the Eastern District of Texas, and elsewhere, **JESUS RAYMUNDO GALLEGOS**, [REDACTED]

[REDACTED] **MOHAMMAD ABEDALHAQ**, a.k.a. "Mo", **DARRYL MARVIN DOMINGUEZ**, a.k.a. "D", **TRENT JOSEPH WOODHOUSE**, **ZACHARY ADRIAN BEDFORD**, **JORGE EDDI SOTO**, **MICHAEL GARRETT PARKER**, **CONNOR HARRISON SNODGRASS**, [REDACTED] **STEPHEN GLENN YARBROUGH**,

[REDACTED] **WALTER HERRERA**, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] and **MORGAN PITTMAN**, defendants, did knowingly combine, conspire, and agree together and with each other and with other persons known and unknown to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute Fentanyl, as alleged in Count Four of this Fifth Superseding Indictment;

1. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of that specified unlawful activity contrary to 18 U.S.C. § 1956(a)(B)(i);

2. did knowingly transport, transmit, or transfer, or attempt to transport,

transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, with intent to promote the carrying on of specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substance, to-wit: Fentanyl, as described in Count Four of this Fifth Superseding Indictment, in violation of 18 U.S.C. § 1956(a)(2)(A); and

3. did knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, involving the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substances, to-wit: Fentanyl, as described in Count Four of this Fifth Superseding Indictment, knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

Count Six

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 14, 2021, in Dallas, Texas, a location within the Northern

District of Texas, **ANTONIO GATEWOOD**, defendant, did knowingly possess firearms, namely, a Glock 19, 9mm, Serial# NUZ833, and an American Tactical Omni Hybrid multi caliber, Serial # NS233288, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Seven

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 14, 2021, in Dallas, Texas, a location within the Northern District of Texas, **ANDRES MORENO, JR.**, defendant, did knowingly possess firearms, namely, a FN Herstal Five-Seven MK2 5.7x28 Cal Pistol w/Magazine & Ammunition, Serial #386412285, a Cobra/Kodiak FS380 .380 Caliber Pistol, Serial #FS108308, a Glock GMBH 19GEN5 9mm Cal Pistol, Serial #BUBN472, and a Maverick Arms Eagle Pass 88 12 Gauge Shotgun, Serial #MW30769Y, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Eight

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 14, 2021, in Dallas, Texas, a location within the Northern District of Texas, **BOBBY JOSEPH KISH**, defendant, did knowingly possess firearms, namely, a FN Herstal PS90, .57 caliber, Serial # FN097530, and a Springfield Armory XD .45 caliber, Serial # S3179924, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Nine

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 28, 2021, in Fort Worth, Texas, a location within the Northern District of Texas, **TRENT JOSEPH WOODHOUSE**, defendant, did knowingly possess firearms, namely, a Gen 4, 10mm, Serial Number BTEL603, a Smith & Wesson SD9, 9mm, Serial Number FBA61674, a Glock Model 43, 9mm, Serial Number ABSY182, and a Sig Suer P238, 380 caliber, Serial Number 27B006458, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Ten

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 17, 2022, in Fort Worth, Texas, a location within the Northern District of Texas, **ZACHARY ADRIAN BEDFORD**, defendant, did knowingly possess a firearm, namely, a Keltec, CNC Industries Inc., 380 Caliber Pistol, Model #P3AT, Serial #LGN91, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Eleven

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 17, 2022, in Fort Worth, Texas, a location within the Northern District of Texas, **JORGE EDDI SOTO**, defendant, did knowingly possess firearms, namely, a Brown FN 509 pistol S/N GKS0181716, a Brigade 9MM AR SBR S/N 15218F, a Glock 19X S/N BSPN531, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

Count Twelve

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 17, 2022, in Fort Worth, Texas, a location within the Northern District of Texas, **MICHAEL GARRETT PARKER**, defendant, did knowingly possess firearms, namely, a black in color, Stephens model 320, 12 gauge shotgun, serial number: 183102A, a black in color Century Arms c39v2 7.62x39 rifle, serial number: C39V2A45268, a black in color, Citadel Boss-25 12-gauge shotgun, serial number: 20-36065, a brown and silver in color, Yildiz Silah Sanayi Burdur, 12-gauge shotgun: serial number: 0177544, a black and tan in color, PF940SC handgun, a black in color, Taurus PT1911 .45acp. serial number: NLN34431, a black in color GHM-G GHM9 9mm, serial number: US 20-29584, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl.

In violation of 18 U.S.C. § 924(c).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

From their engagement in the violation alleged in this Fifth Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the

offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

- a. 2017 Chevrolet Silverado Truck, in the color of Black, bearing the VIN: 3GCUKSEJ1HG282312 seized from Juan Daniel Alcocer-Alonso.
- b. Ben Baller 0288 Money Counter seized from Juan Daniel Alcocer-Alonso.
- c. \$41,765.00 in U.S. Currency seized from Juan Daniel Alcocer-Alonso.
- d. Bear Creek Arsenal BCA15 Rifle w/Magazine and Ammunition seized from Juan Daniel Alcocer-Alonso.
- e. Colt Government 38 Pistol w/Magazine seized from Juan Daniel Alcocer-Alonso.
- f. Ruger Ruger-57 Pistol w/Magazine and Ammunition seized from Juan Daniel Alcocer-Alonso.
- g. Two (2) 762 Cal Magazines and Ammunition seized from Juan Daniel Alcocer-Alonso.
- h. \$6,533.00 in U.S. Currency seized from Richard B. Villasenor.
- i. Ben Baller 0288 Money Counter seized from Richard B. Villasenor.
- j. Ruger LC9 9mm Pistol with Magazine and Ammunition seized from Richard B. Villasenor.
- k. 2019 Toyota Corolla, in the color of Blue, bearing the VIN: 5YFBURHE0KP944875 seized from Richard B. Villasenor.
- l. 2014 Cadillac ATS, in the color of Black, bearing the VIN: 1G6AA5RA5E0195145 seized from Richard B. Villasenor.
- m. \$7,041.00 in U.S. Currency seized from Richard B. Villasenor.
- n. \$4,856.00 in U.S. Currency seized from Anfernee Alexander Marban.
- o. \$2,353.00 in U.S. Currency seized from Jesus Raymundo Gallegos.
- p. Assorted Jewelry, valued at \$26,600.00 seized from Jesus Raymundo Gallegos.
- q. Assorted Sneakers, valued at \$2,994.00 seized from [REDACTED]
- r. Glock GMBH 19X Pistol w/Magazine & Ammunition seized from John Jacob Coalson.
- s. Winchester 1300 12 Gauge Shotgun seized from John Jacob Coalson.
- t. Century Arms International C39 Pistol w/Magazine & Ammunition seized from John Jacob Coalson.
- u. \$17,653.00 in U.S. Currency seized from John Jacob Coalson.
- v. Cassida Money Counter seized from Mohammad Abedalhaq.
- w. Assorted Jewelry, valued at \$46,800.00 seized from Mohammad Abedalhaq.
- x. Large Personalized "ICED" Diamond Pendant in 10K White Gold, Name reads "MOE", valued at \$5,500.00 seized from Mohammad Abedalhaq.

- y. 2018 Jeep Grand Cherokee TrackHawk, in the color of Gray, bearing the VIN: 1C4RJFN98JC293838 seized from Mohammad Abedalhaq.
- z. a Gen 4, 10mm, Serial Number BTEL603, seized from Trent Joseph Woodhouse.
- aa. a Smith & Wesson SD9, 9mm, Serial Number FBA61674, seized from Trent Joseph Woodhouse.
- bb. a Glock Model 43, 9mm, Serial Number ABSY182, seized from Trent Joseph Woodhouse.
- cc. a Sig Suer P238, 380 caliber, Serial Number 27B006458, seized from Trent Joseph Woodhouse.
- dd. \$14,587.00 in U.S. Currency seized from Darryl Marvin Dominguez.
- ee. WETOLS WE-186 Money Counter seized from Darryl Marvin Dominguez.
- ff. Glock GMBH 26GEN4 9mm Pistol w/Magazines & Ammunition seized from Darryl Marvin Dominguez.
- gg. Assorted Jewelry, valued at \$4,875.00 seized from Darryl Marvin Dominguez.
- hh. FN Herstal Five-Seven MK2 .57 Caliber Pistol w/Magazine & Ammunition seized from Andres Moreno, Jr..
- ii. Cobra/Kodiak FS380 .380 Caliber Pistol seized from Andres Moreno, Jr..
- jj. Glock GMBH 19GEN5 9mm Caliber Pistol seized from Andres Moreno, Jr..
- kk. Maverick Arms Eagle Pass 88 12 Gauge Shotgun seized from Andres Moreno, Jr..
- ll. \$5,932.00 in U.S. Currency seized from Bobby Joseph Kish.
- mm. HS Produkt XDS .45 Caliber Pistol w/Magazine & Ammunition seized from Bobby Joseph Kish.
- nn. 2020 Dodge Charger Scat Pack, in the color of Maroon, bearing the VIN: 2C3CDXGJ9LH107044 seized from Bobby Joseph Kish.
- oo. \$16,980.00 in U.S. Currency seized from Zachary Adrian Bedford.
- pp. a Keltec, CNC Industries Inc., 380 Caliber Pistol, Model #P3AT, Serial #LGN91, seized from Zachary Adrian Bedford.
- qq. 2017 Ford F150, in the color of Gray, bearing the VIN: 1FTEW1EF4HKC96065 seized from Zachary Adrian Bedford.
- rr. \$78,516.00 in U.S. Currency seized from Jorge Eddi Soto.
- ss. a Brown FN 509 pistol S/N GKS0181716, seized from Jorge Eddi Soto.
- tt. a Brigade 9MM AR SBR S/N 15218F, seized from Jorge Eddi Soto.
- uu. a Glock 19X S/N BSPN531 seized from Jorge Eddi Soto.
- vv. 2002 Chevrolet Silverado 2500 Truck, in the color of black, bearing the VIN: 1GCHC23112F241589, seized from Michael Garrett Parker.
- ww. 2014 Chevrolet Corvette Coupe 2D LT, in the color of red, bearing the VIN: 1G1YB2D79E5129728, seized from Michael Garrett Parker.
- xx. 2007 Yamaha YZF-R1 Motorcycle, in the color of silver, bearing the VIN: JYARN20E97A009053, seized from Michael Garrett Parker.

yy. \$36,334.00 in U.S. Currency, seized from Michael Garrett Parker.
zz. \$1,083.00 in U.S. Currency, seized from Michael Garrett Parker.
aaa. Aneken AL1000 Money Counter, seized from Michael Garrett Parker.
bbb. Century Arms International C39V2 7.62 Caliber Pistol with Magazine and Ammunition, seized from Michael Garrett Parker.
ccc. Yildiz Shotgun IND SPZ-ME 12 Gauge Shotgun with Ammunition, seized from Michael Garrett Parker.
ddd. Sun City Machinery Company LTD Stevens 320 12 Gauge Shotgun with Ammunition, seized from Michael Garrett Parker.
eee. Francolin International Arms Company Citadel Boss-25 12 Gauge Shotgun with Magazine and Ammunition, seized from Michael Garrett Parker.
fff. Polymer80 Incorporated Pistol, seized from Michael Garrett Parker.
ggg. Brugger & Thomet AG GHM9 9mm Caliber Pistol with Magazine and Ammunition, seized from Gage Butler.
hhh. Taurus PT1911 .45 Caliber Pistol with Magazine and Ammunition, seized from Gage Butler.
iii. \$13,480.00 in U.S. Currency, seized from Joseph Michael Ross.
jjj. \$1.00 in U.S. Currency, seized from Connor Harrison Snodgrass
kkk. \$14,057.00 in U.S. Currency, seized from [REDACTED]
lll. Glock GMBH 19GEN4 9mm Pistol w/Magazine and Ammunition, seized from [REDACTED]
mmm. Glock GMBH GEN19X 9mm Pistol w/Magazine and Ammunition, seized from [REDACTED]
nnn. \$54,908.00 in U.S. Currency, seized from Joseph Ramirez Santos.
ooo. Glock GMBH 45 9mm Caliber Pistol with Magazine and Ammunition, seized from Joseph Ramirez Santos.
ppp. Precision Plus Bill Counter 0288 UV/MG, seized from Joseph Ramirez Santos.
qqq. \$5,293.00 in U.S. Currency, seized from Faizon Tyree Brown.
rrr. \$1,981.00 in U.S. Currency, seized from Faizon Tyree Brown.
sss. Glock 23GEN5 Pistol w/Magazine and Ammunition, seized from Faizon Tyree Brown.
ttt. Bushmaster Firearms XM15-E2S .223 Caliber Rifle, seized from Faizon Tyree Brown.
uuu. Aneken NX-580 Money Counter, seized from Faizon Tyree Brown.
vvv. Louis Vuitton M43701 Graceful PM Purse, seized from Faizon Tyree Brown.
www. \$10,061.00 in U.S. Currency, seized from Walter Antonio Herrera.
xxx. Assorted Jewelry, valued at \$11,000.00, seized from Walter Antonio Herrera.
yyy. Ninety-One (91) Rounds of Assorted Ammunition and Three (3) Magazines, seized from Walter Antonio Herrera.

The United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), and as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

GRAND JURY FOREPERSON

BRIT FEATHERSTON
United States Attorney

By:

COLLEEN BLOSS
Assistant United States Attorney

ERNEST GONZALEZ
Assistant United States Attorney

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v.

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[REDACTED] (56)	§

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: If 1,000 kilograms or more of a mixture or substance containing a detectable amount of marijuana -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

Counts Two & Three

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not less than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Count Four

Violation: 21 U.S.C. § 846 & 21 U.S.C. § 841(a)(1)

Penalty: If 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) – A term of imprisonment of not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

If more than 40 grams but less than 400 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) – A term of imprisonment of not less than 5 years but not more than 40 years, a fine not to exceed \$5 million, or both; supervised release of at least four years.

If less than 40 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) -- A term of imprisonment of not more than 20 years imprisonment, a fine not to exceed \$1,000,000.00 or both; supervised release of at least three years.

If death or serious bodily injury resulted from the uses of such substance then a term of imprisonment of not less than 20 years or more than life, a fine not to exceed \$5,000,000 or both. A term of supervised release of at least five (5) years.

Special Assessment: \$100.00

Count Five

Violation: 18 U.S.C. § 1956(h) in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1957

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss. A term of supervised release of not more than 3 years.

Special Assessment: \$100.00

Counts Six - Twelve

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not less than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.